

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Larry Reid, et al.,

Plaintiffs,

— vs —

Darryl Moore,

Defendant.

Case No. 1:21-cv-00991

Judge James S. Gwin

Motion for a Status Conference

On November 8, 2021, Counsel for the Defendant filed a Motion for Leave to Withdraw (ECF No. 23), citing a deterioration in the attorney-client relationship and the failure of the Defendant to cooperate in the prosecution of his case. To the extent that it matters, the Plaintiffs do not oppose the Motion.

The Motion also suggests that the Court stay the captioned matter, or continue dates to permit the Defendant to obtain new counsel but does not suggest specific extensions or dates.

Plaintiffs agree that, given the circumstances, it would be beneficial to revisit the case management schedule, but respectfully suggest that the Court would benefit from conducting a status conference before doing so, especially given that the Defendant has failed to make initial disclosures, delaying the promulgation of paper discovery by the Plaintiffs.¹

For these reasons, the Plaintiffs respectfully move for an Order setting a videoconference case management conference to discuss the best approach to resetting dates and deadlines in light of the recently filed Motion to Withdraw.

¹ In the Planning Report of the Parties (ECF No. 13), the Parties represented that initial disclosures would be exchanged prior to the Initial Case Management on September 8, 2021, an obligation the Plaintiffs met but which the Defendant has yet to meet. Despite several follow-up communications, the Defendant has yet to provide his initial discloses, and the recent Motion to Withdraw suggests that Counsel for the Defendant has in good faith tried, but has been unable to elicit the cooperation of his client in doing so.

Respectfully submitted

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Attorneys for the Plaintiffs

– Certificate of Compliance –

The undersigned certified that this document complies with the requirement of L. R. Civ. 7.1(f) in that, exclusive of appendices, each of the statement checked below is true;

- ☒ It relates to a non-dispositive motion and is less than fifteen (15) pages;
- ☐ It relates to a dispositive motion in a case designated as on the expedited track, and is not longer than ten (10) pages;
- ☐ It relates to a dispositive motion in a case designated as administrative or standard track, or in a case not yet given a differentiated case management track designation, and is not longer than twenty (20) pages;
- ☐ It relates to a dispositive motion in a case designated as on the complex track, and is not longer than thirty (30) pages;
- ☐ It relates to a dispositive motion in a case designated as on the mass tort track, and is not longer than forty (40) pages;
- ☐ It exceeds fifteen (15) pages in any event, and it thus contains a brief statement of the issue(s) to be decided, a brief statement of the argument(s) made, and tables of both contents and of the authorities cited therein.

Respectfully submitted

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One of the attorneys for Plaintiffs

– Certificate of Service –

The foregoing was filed today, Wednesday, November 10, 2021, via the Court Electronic Filing System. Service will be made upon counsel of record by, and copies of this filing may be obtained through operation of the CM / ECF System.

Respectfully submitted

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